

Long-Term Care Survey Alert

MDS CORNER: Reader Question: Know Who Can Sign at R2 and What Signing Means

Question: What legally speaking is the nurse who signs at R2a (signature of person coordinating the assessment) committing herself to in case a question should come up with medical reviewers, surveyors or even a Medicaid fraud unit about a particular MDS? When might a nurse sign at R2a without signing the attestation statement? Also, can an LPN sign at R2a in any circumstance -- for example, if the facility temporarily doesn't have an RN?

Answer: The RN signature and date at R2a and R2b verify completion of the full assessment form. The signature and date of the RN coordinator for the RAP completion process (VB1 and VB2) attest to the completion of the RAPs and the comprehensive assessment. In neither case is the RN attesting to accuracy.

The attestation at AA9 is a separate, unrelated matter. When a staff member signs and completes AA9, he or she is attesting to the accuracy of the items on the MDS he or she completed and identified in AA9. Only an RN can sign at R2a and VB1. The only exception would be for a rural facility that has a formal waiver of the RN requirement.

Source: Rena Shephard, MHA, RN, RAC-MT, C-NE, president and CEO of RRS Healthcare in San Diego, and founding chair and executive editor for the American Association of Nurse Assessment Coordinators.